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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:  CELSIUS NETWORK, LLC, et al.,  Debtors.	Case No.: 22-10964 (MG)  Chapter 11  Document No. _____  Related to Doc. No. 1325
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**JOINDER IN VARIOUS OBJECTIONS AND RESERVATION OF RIGHTS TO DEBTOR'S  
MOTION FOR ENTRY OF AN ORDER (I) ESTABLISHING OWNERSHIP OF ASSETS IN  
THE DEBTORS' EARN PROGRAM, (II) PERMITTING THE SALE OF STABLECOIN IN  
THE ORDINARY COURSE AND (III) GRANTING RELATED RELIEF**

Comes now, Kim David Flora and Brett Flora (collectively, "Respondents") by and through their undersigned counsel, and file this *Joinder in Various Objections and Reservation of Rights to the Debtor's Motion For Entry of an Order Establishing Ownership of Assets in the Debtors' Earn Program, (II) Permitting the Sale of Stablecoin in the Ordinary Course and (III) Granting Related Relief* filed by Stuart McLean at Document No. 1491 (the "Objection"), stating as follows:

1. On November 11, 2022, the Debtors filed their *Amended Motion for Entry of An Order (I) Establishing Ownership of Assets in the Debtors' Earn Program, (II) Permitting the Sale of Stablecoin in the Ordinary Course, and (III) Granting Related Relief* (the "Earn Motion").

2. On November 29, 2022, Stuart McLean filed that certain Objection and Reservation of Rights to the Earn Motion (the "Objection"). On multiple dates, various Earn account owners and other parties in interest filed objections to the Earn Motion (the "Other Objections").

3. Respondents are owners of Earn accounts and assets therein, and hereby join in and assert the positions and averments made and relief requested in the Objection and Other Objections.

4. Respondents submit this Joinder without prejudice to, and with full reservation of, their rights to file separate pleadings in response to the Earn Motion or other pending Debtor matter.

5. As has been acknowledged by the Debtors, Respondents further reserve and preserve any and all claims, causes of action, and defenses that they may have with regard to the Debtors or any other party in interest, including without limitation as to any alleged contract with the Debtors. Furthermore, Respondents reserve the right to amend and/or supplement this Joinder based on discovery of additional facts and information.

WHEREFORE, Respondents hereby join in the Objection and Other Objections and respectfully request that the Court enter an Order denying the Debtors' Earn Motion in its entirety, and entering any additional relief deemed just and proper.

Dated: December 1, 2022

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 1, 2022, copies of the within pleading were served upon all parties receiving notice in these proceedings electronically via the Court's CM/ECF system:

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